



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE SUITE 1200
DALLAS TX 75202 2733

OCT 20 1994

FRP NUMBER FFP-116 AF-000142
ARKANSAS TERMINALING AND TRADING
NORTH LITTLE ROCK
ROUTE 1-BOX 67A-CENTRAL AIRPORT ROAD
NORTH LITTLE ROCK AR 72117-

Section 311(j)(5) of the Clean Water Act (CWA) as amended by § 4202(a)(5) of the Oil Pollution Act of 1990 (OPA) requires an onshore facility, which because of its location could reasonably be expected to cause significant and substantial harm to the environment by discharging into or on the navigable waters or adjoining shorelines or the exclusive economic zone (significant and substantial harm facility) to have a facility response plan (FRP) approved by the Environmental Protection Agency (EPA or the Agency). Section 311(j)(5)-(E) of CWA prohibits a significant and substantial harm facility from handling, storing, or transporting oil if its plan has not yet been approved by the Agency unless the facility has been granted an extension by the Agency. Section 4202(b)(4)(C) of OPA states that the prohibition is effective on August 18, 1993.

EPA notified you that your facility is a significant and substantial harm facility. The Agency, however, authorized your facility to continue to operate without approval of your facility response plan until February 18, 1995, based on a review of your facility's certification of response resources.

EPA completed an initial review of your facility response plan against the statutory requirements of § 311(j)(5) of CWA and requested additional information. In order to complete the Agency's review of your facility's response plan, the Agency needs the additional information, as requested, from the "Missing Information Checklist" within 30 days from the date of this letter or a schedule of compliance not to exceed the statutory deadline of February 18, 1995, according to 40 CFR Part 112.20.

Although the Agency initially reviewed your facility's plan against the minimum statutory requirements, please note that EPA issued its final Facility Response Plan regulation (59 FR 34070). Your facility response plan must come into compliance with every provision of that regulation by February 18, 1995, and you must revise your response plan if necessary to satisfy the requirements of this rule and resubmit your plan (or updated portions) to

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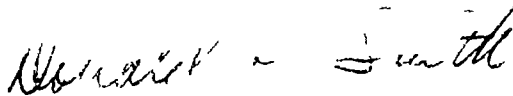


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U S Environmental Protection Agency Region VI
Contingency Planning Section
P O Box 303
Dallas Texas 75221-0303

If you have any questions concerning this matter please contact my office at (214) 665-6489
For facility specific information contact Don Kluth at (214) 855-0711 or fax to (214) 855
0712

Sincerely

A handwritten signature in cursive script, appearing to read "Donald P. Smith".

Donald P Smith
Senior On Scene Coordinator